

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

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In Re:	:	Chapter 13
Jami Lemerise	:	
	:	Case No.: 20-10885ELF
Debtor(s)	:	

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**MOTION TO APPROVE LOAN MODIFICATION WITH M&T BANK**

**NOW INTO COURT COMES**, Jami Lemerise, hereinafter referred to as “Debtor”, move this Honorable Court for an Order approving her loan modification with M&T Bank (“Mortgagee”), and aver the following:

1. On February 13, 2020, Debtor filed a Voluntary Petition for relief under Chapter 13 of the Bankruptcy Code.
2. M&T Bank, the Mortgagee, has agreed to a mortgage loan modification on the debtor’s home located at 820 Avenue F, Langhorne, PA 19047 as the debtor has successfully completed trial plan payments. Please find the loan modification attached and marked as “**Exhibit A.**”
3. Additionally, the Mortgagee has approved the debtor for a permanent modification.
4. One of the conditions for giving this loan modification is the required approval from the Bankruptcy Court permitting the debtors to enter into a Final Modification.
5. The incurring of this loan modification is beneficial to all parties in this case in that it will allow M&T Bank to receive the necessary payments to complete the loan while allowing the debtors to retain their property without facing further financial strain.

6. The Debtor has continued to comply with the terms of the Chapter 13 Plan, but will need to Motion to Modify her Plan or potentially convert her case to Chapter 7 given that the loan has been made current through the loan modification.

**WHEREFORE**, Debtor respectfully request that an Order be entered allowing a loan modification on the property located at 820 Avenue F, Langhorne, PA 19047.

Dated: January 7, 2021

/s/Brad J. Sadek, Esq  
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